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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA**

VOICE OF THE ARCTIC IÑUPIAT,

Plaintiff,

v.

BUREAU OF LAND MANAGEMENT, et al.,

Defendants.

Case No. 3:24-cv-00136-SLG

CONOCOPHILLIPS ALASKA, INC.,

Plaintiff,

v.

DEPARTMENT OF THE INTERIOR, et al.,

Defendants.

Case No. 3:24-cv-00142-SLG

NORTH SLOPE EXPLORATION, LLC, et  
al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF THE  
INTERIOR, et al.,

Defendants.

Case No. 3:24-cv-00143-SLG

*Voice of the Arctic Iñupiat v. BLM, et al*  
JOINT MOTION TO STAY CASES

Case Nos. 3:24-cv-00136, -142, -143, -144, -145-SLG

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STATE OF ALASKA,

Plaintiff,

and

ALASKA OIL AND GAS ASSOCIATION,

Intervenor-Plaintiff,

v.

BUREAU OF LAND MANAGEMENT, et al.,

Defendants.

Case No. 3:24-cv-00144-SLG

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NORTH SLOPE BOROUGH,

Plaintiff,

v.

BUREAU OF LAND MANAGEMENT, et al.,

Defendants.

Case No. 3:24-cv-00145-SLG

### **UNOPPOSED JOINT MOTION TO STAY CASES**

Defendants, Bureau of Land Management, et al., Plaintiffs, and Intervenor-Plaintiff, respectfully move to stay all case deadlines in the above-captioned related cases pending completion of the proposed regulatory action set forth at 90 Fed. Reg. 23507 (June 3, 2025).

These cases challenge a Final Rule titled “Management and Protection of the National Petroleum Reserve in Alaska.” *See* 89 Fed. Reg. 38,712 (May 7, 2024) (the “NPR-A Rule”). Following previous extensions, Plaintiffs’ and Intervenor-Plaintiff’s opening briefs are due June 16, 2025. *See* Order on Unopposed Mot. for Extension of Time, ECF No. 42 (Case No. 3:24-cv-00136-SLG).

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A stay of this litigation is warranted because on June 3, 2025, Defendants issued notice of a proposed rule to rescind the NPR-A Rule. *See* 90 Fed. Reg. 23507 (June 3, 2025). The notice provides for a 60-day public comment period. After the close of the public comment period, Defendants will respond to comments and finalize the rule. The time it takes to issue the final rule will largely be dependent on the number and complexity of the comments received and whether Defendants determine that those comments necessitate any changes to the proposed rule. Nevertheless, Defendants will endeavor to finalize the rule as soon as possible.

“[T]he power to stay proceedings is incidental to the power inherent in every court to control disposition of the cases on its docket with economy of time and effort for itself, for counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936). “The District Court has broad discretion to stay proceedings as an incident to its power to control its own docket.” *Clinton v. Jones*, 520 U.S. 681, 706 (1997). In determining whether to grant a motion to stay, “the competing interests which will be affected by the granting or refusal to grant a stay must be weighed.” *Lockyer v. Mirant Corp.*, 398 F.3d 1098, 1110 (9th Cir. 2005). Those interests include: (A) “the possible damage which may result from the granting of a stay,” (B) “the hardship or inequity which a party may suffer in being required to go forward,” and (C) “the orderly course of justice measured in terms of the simplifying or complicating of issues, proof, and questions of law which could be expected to result from a stay.” *Id.*

These standards are met here. The proposal to rescind the challenged NPR-A Rule provides good cause to stay the pending deadlines in these related cases. The completion

of the rulemaking process may obviate the need for further litigation and thereby conserve judicial, public, and private resources, and promote the efficient and orderly disposition of these cases.

In light of the foregoing, Defendants, Plaintiffs, and Intervenor-Plaintiff respectfully request that the Court issue an order setting the following modified deadlines for further proceedings:

1. All existing deadlines in these related cases are stayed pending further order from the Court.
2. Plaintiffs, Intervenor-Plaintiff, and Defendants shall submit a joint status report within 30 days after completion of the rulemaking process described in 90 Fed. Reg. 23507 (June 3, 2025), or within 60 days after close of the public comment period on the proposed rule, whichever occurs first.

Counsel have conferred, and the Intervenor-Defendants in the above captioned cases take no position on this motion.

Respectfully submitted,

DATED: June 10, 2025.

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### **CERTIFICATE OF SERVICE**

I hereby certify that on June 10, 2025, a copy of the foregoing was served by electronic means on all counsel of record by the Court's CM/ECF system.

/s/ Paul A. Turcke

Paul A. Turcke